



O.E.P.A.  
S.E.D.O.

2008 MAY 12 PM 12:24

May 9, 2008

Ms. Abbot Stevenson  
Environmental Engineer  
Ohio EPA – SEDO  
2195 Front Street  
Logan, OH 43138

Dear Ms. Stevenson:

We are in receipt of your letter of April 14, 2008. Allow us to comment on the points addressed in your letter.

1. At no time did the No. 2 slurry impoundment flow through Pond 13 (Outfall 013) during this time. After the flow of water from the slurry impoundment was stopped on February 28, some solids remained in the ditch. In order to avoid putting solids into Perkins Run or Captina Creek, we temporarily diverted the ditch from the slurry impoundment to pond 13. This was done as an emergency action in the event that rain could cause flow in the ditch before the slurry was cleaned up. After the ditch was cleaned, the ditch from the slurry impoundment was restored to its normal path.
2. The cause of elevated levels of total iron and manganese was higher than normal iron and manganese. We have increased the treatment to handle these higher concentrations. In addition, personnel are checking the treatment twice per day and assuring that the water quality is within effluent limitations at all times. Previously, the treatment had only been checked once per day. That schedule has been revised.
3. The cause of the problems at the pond 10 was that water had been inadvertently diverted to this pond and the pond was inadequately sized for this additional flow of water. Normally, this pond does not flow. The diversion has been corrected. Additionally, the pond has been cleaned to provide more storage volume.
4. The problems with the CBOD at the sewage treatment plant were related to a mechanical problem with the aeration at the plant. The blower was replaced and the CBOD problem was alleviated.
5. We are making the drainage control map that you requested and will send it to you when it is completed. The map will indicate watershed size and disturbed area. The pond information will be included with that map. We expect to have the map within two weeks.
6. There is very little flow from the underdrains. The pond (Pond 13) primarily is used to treat surface runoff from the face of the impoundment, although some flow from the underdrains occurs and is treated in the pond. Pond 14 (upstream of Pond 13) has begun to treat some of the flow that reported to Pond 13. Reclamation of additional areas on the face of the slurry impoundment will begin when weather permits this spring, which will remove some exposure of runoff water to refuse.

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TOVCC 00913

7. The sampling/monitoring station was not installed immediately after the new decant was finished because it would take several months to begin to discharge again. Poor weather conditions hampered efforts to install the monitor/sampler later in 2007. When we experienced a snow melt and high rainfall in early 2008, the water levels in the impoundment raised faster than anticipated, and it became necessary to discharge prior to installing the monitor/sampler. The sampler/monitor has been re-installed and is operational, but there has been no flow from the slurry impoundment since February 28, 2008

Samples were not taken at the outfall because we stopped the flow from the outfall as soon as we learned of the problem, and there was no flow to sample at the outfall. Samples were taken downstream of outfall 001. Samples will be taken when flow resumes.

8. According to our permit, a wheel washer is used to prevent drag out of fines onto State Route 148, and if fines are deposited on the roadway, they will be promptly cleaned up with the use of a sweeper truck. The wheel washer was not in use at the time due to freezing temperatures, per our permit. The use of water during freezing conditions would create a traffic hazard.
9. The dike for the clean coal pile is sized for a 10-year, 24 hour storm event. The dike is at elevation 830± with the water in the sump at the end of the dike at elevation 825±.
10. Ohio Valley does not "dam up" Captina Creek during low flow periods. We pump water from the impoundment directly to a tank for use underground and in the preparation plant.
11. Quality Environmental Services has been contracted to provide the necessary wastewater operator.
12. The enclosed list addresses the chemicals used in the impoundment.
13. We share your concern about the release of slurry into Perkins Run and Captina Creek. Please be assured that we are doing everything possible to prevent any release of slurry. We are committed to operating in an environmentally sound manner. The measures previously described to you will assure that there will be no future releases.

Please address all future correspondence to my attention. The person directly in charge of this operation is Mr. Kevin Hughes, Superintendent.

Sincerely,  
THE OHIO VALLEY COAL COMPANY



David L. Bartsch, P.E.  
Environmental Coordinator and  
Permit Administrator

cc: R. Murray, K. Hughes, J. Forrelli, D. Meadows, File

Marathon No. 2 High Sulfur Diesel

Purpose: Coal Recovery in Froth Circuit

Amount: 180 cc/min. (Century)

Add Location: In plant Flotation Circuit (goes out with clean coal)

Sulfuric Acid

Purpose: pH Control

Amount: 0.07 gal./1000 gal. Water (Century)/0.02 gal/1000 gal (OVCC)

Add Location: Thickener at preparation plants

NALCO 8876 (flocculant aid)

Purpose: Flocculant

Amount: 0.05 gal/1000 gal. Water (OVCC)

Add Location: Thickener at preparation plants

NALCO 9850 (closed circuit coagulant)

Purpose: Settle solids in thickener

Amount: 0.06 gal./1000 gal. Water (Century)

Add Location: Feed to thickener at preparation plant

NALCO 9742

Purpose: Flotation Frother

Amount: 90 cc/min. (Century)

Add Location: Plant Flotation Circuit (goes out with clean coal)

OPTIMER CM-630 Flotation Frother NOT USED

Purpose: Coal Recovery in Froth Circuit

Amount:

Add Location: In plant Flotation Circuit (goes out with coal)

X-115 NOT USED

Purpose:

Amount:

Add Location:

PRAESTOL CM-302 NOT USED

Purpose:

Amount:

Add Location:

NALCO 9824 Plus Anionic Flocculant

Purpose: Settling solids

Amount: 0.06 gal./1000 gal. Water (Century)/0.05gal/1000 gal Water (OVCC)

Add Location: Thickener - Century Plant